

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

RICHARD LANE and)	
LYNN LANE,)	
)	
Plaintiffs,)	
)	
)	
)	
V.)	Docket No.:
)	
)	JURY DEMAND
)	
)	Judge:
STATE AUTO PROPERTY)	
AND CASUALTY INSURANCE)	Magistrate:
COMPANY, a.k.a)	
STATE AUTO INSURANCE)	
COMPANIES,)	
)	
Defendant.)	

NOTICE OF REMOVAL OF CIVIL CASE

Defendant, State Auto Property and Casualty Insurance Company (“State Auto”), pursuant to 28 U.S.C. Sections 1332, 1441(a) and (c), and 1446, hereby gives notice of removal of this action from the Circuit Court of Sumner County, Tennessee, to the United States District Court for the Middle District of Tennessee, at Nashville, and avers as follows:

1. On or about January 22, 2015, Plaintiffs Richard and Lynn Lane filed a Complaint against State Auto in the Circuit Court for Sumner County, Tennessee, under File No. 83CCI-2015-CV-61 (Attached as Exhibit 1).

2. On January 26, 2015, State Auto was served with a copy of the Complaint via the Tennessee Department of Commerce and Insurance. This was the first receipt or notice of the Complaint by State Auto. No proceedings on the Complaint have transpired in the Circuit Court for Sumner County.

3. Richard Lane and Lynn Lane are citizens and residents of Robertson County, Tennessee.

4. State Auto is an Ohio Corporation with its principal place of business in Columbus, Ohio.

5. The Complaint seeks \$275,000 in payment under the insurance policy, plus an additional twenty-five (25%) percent bad faith penalty, pursuant to T.C.A. Section 56-7-105.

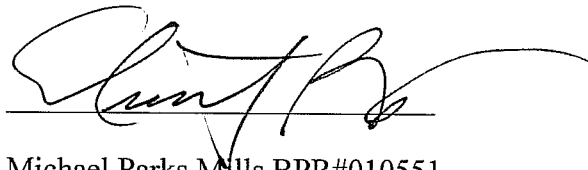
6. There is complete diversity of citizenship, and the amount in controversy in this case, exclusive of interest and costs, exceeds \$75,000.

7. State Auto has filed a copy of this notice with the Circuit Court of Sumner County, Tennessee, and has served a copy on the attorney for the Plaintiffs.

8. Michael Parks Mills, counsel for State Auto, is duly licensed in the State of Tennessee and is admitted to practice in the United States District Court for the Middle District of Tennessee.

WHEREFORE, State Auto requests this action be removed from the Circuit Court for Sumner County, Tennessee to the United States District Court for the Middle District of Tennessee.

Respectfully Submitted,

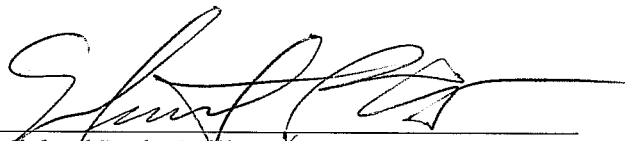
A handwritten signature in black ink, appearing to read 'Michael Parks Mills', is written over a horizontal line.

Michael Parks Mills BPR#010551
Mills & Cooper
5042 Thoroughbred Lane
Brentwood, TN 37027
(615)221-8218
michaelmills@millscooper.comcastbiz.net

CERTIFICATE OF SERVICE

I hereby certify that on 25th day of February, 2015, a true and correct copy of this notice was sent via first class mail, postage prepaid, and via e-mail, to the following:

Benjamin K. Dean
Attorney at Law
2209 Memorial Blvd.
Springfield, TN 37127
ben@robertsoncountylaw.com


Michael Parks Mills